



Verification report: ITL2501119

# **Eyecon Alderney Limited**

## **Fluffy Arcade: Coconut Shy LuckyTap Certification Report**

**11 June 2025**

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***This test report is valid only for the intended jurisdiction as stated in this report and has no legal value in any other jurisdiction***



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### I. General information

No.	Description	Details								
1.	Identification	Fluffy Arcade: Coconut Shy LuckyTap								
2.	Verification body issuing the certificate (test house)	<p>iTech Labs Suite 24, 40 Montclair Ave Glen Waverley, VIC 3150, Australia URL: <a href="http://www.itechlabs.com">http://www.itechlabs.com</a> E-mail: <a href="mailto:info@itechlabs.com">info@itechlabs.com</a></p> <p>iTech Labs is accredited to ISO/IEC 17025 by National Association of Testing Authorities (NATA), Australia to undertake compliance testing and audits of online Gaming systems. iTech Labs accreditation (#15690) details can be downloaded from <a href="#">NATA</a> website. NATA has entered into a mutual recognition agreement and/or multilateral agreement of accreditation with <a href="#">ILAC</a> and is in the list of Signatories to the ILAC Mutual Recognition Arrangements.</p> <p>All assessments in the following sections of this report are provided under ISO/IEC 17025 except where otherwise stated.</p>								
3.	Standards used for testing	<ul style="list-style-type: none"><li>• Alderney Gambling Control Commission Technical Standards and Guidelines for Internal Control Systems and Internet Gambling Systems – Version 4.5</li><li>• UK Gambling Commission UK Remote Gambling and Software Technical Standards – February 2021 Testing Strategy for Compliance with Remote Gambling and Software Technical Standards – February 2021</li><li>• Gibraltar Remote Technical and Operating Standards for the Gibraltar Gambling Industry – Gambling Commissioner’s Guidelines – v.1.1.0</li><li>• Isle of Man IOM Online Gambling (Systems Verification) (No. 2) – Regulations 2007</li><li>• Malta Malta Remote Gaming Regulations S.L.438.04 LEGAL NOTICE (L.N.) 131 of 2016 Directive 2 of 2018 - Player Protection Directive - V3 – January 2023</li></ul> <p>Please refer to <b>Appendix</b> at the end of this report for details</p>								
4.	Target jurisdiction	Alderney, UK, Gibraltar, Isle of Man, Malta								
5.	Details of the module tested	<table><tr><th>No.</th><th>Game Name</th><th>Game Type</th><th>Channel</th></tr><tr><td>1.</td><td>Fluffy Arcade: Coconut Shy LuckyTap *</td><td>Slot</td><td>HTML5: (Desktop &amp; Mobile)</td></tr></table>	No.	Game Name	Game Type	Channel	1.	Fluffy Arcade: Coconut Shy LuckyTap *	Slot	HTML5: (Desktop & Mobile)
No.	Game Name	Game Type	Channel							
1.	Fluffy Arcade: Coconut Shy LuckyTap *	Slot	HTML5: (Desktop & Mobile)							



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		*Three variants: with and without Jackpot
6.	Type of the module tested	Casino Games
7.	Produced by	Eyecon Alderney Limited Millennium House, Ollivier Street, Alderney GY9 3TD Contact: Charlotte Procter ( <a href="mailto:charlotte.procter@eyecon.com">charlotte.procter@eyecon.com</a> )
8.	Licensee details	Not applicable
9.	Date of request for verification	25 APRIL 2025
10.	Date of completion	11 June 2025
11.	Platform supplier	Eyecon Alderney Limited
12.	Platform version	Version: GS 3.20.2
13.	RNG used for testing	2.0.0 REF: ITL2401086_RNG_AGCC_Eyecon_03Jul24 ITL2401085_RNG_UK_Eyecon_03Jul24 ITL2401049_RNG_IOM_Eyecon_04Jul24 ITL2401050_RNG_MGA_Eyecon_03Jul24 ITL2401101_RNG_GIB_Eyecon_04Jul24
14.	Other records	Fluffy Arcade: Coconut Shy LuckyTap is a new game and has not been previously certified.  Testing was conducted on the following devices: <ul style="list-style-type: none"><li>• PC</li><li>• iPhone XS MAX (Browser: Safari)</li><li>• Samsung Galaxy S20 (Browser: Chrome)</li><li>• iPad Mini 4 (Browser: Safari)</li><li>• Samsung Galaxy Tab 4 (Browser: Chrome)</li></ul>

## II. Details of hardware

No.	Description	Details
1.	Produced by	Not applicable
2.	Identification of hardware	Not applicable
3.	Features that characterize the hardware	Not applicable
4.	Reference to verification	Not applicable
5.	Other records	Not applicable

## III. Details of software components

No.	Description	Details
1.	Produced by	Eyecon Alderney Limited Millennium House, Ollivier Street, Alderney GY9 3TD Contact: Charlotte Procter ( <a href="mailto:charlotte.procter@eyecon.com">charlotte.procter@eyecon.com</a> )
2.	Details of the software components	<a href="#">Fluffy Arcade: Coconut Shy LuckyTap 93 WEB</a>



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		<b>Front End</b>	<b>Rules</b>
		com.eyecon.orion.games.luckytap-fluffy-arcade-coconut-shy	carbine-luckyTap_fluffyArcadeCoconutShy_93_standard-config
		<b>Version:</b> 1.0.7	<b>Version:</b> 1.0.0
		<b>SHA1:</b> f591c6338b95446e2bbd5e32d7bfaca75cdd525f	<b>SHA1:</b> 3bedea2b48626e0f362018e44bb0df23ec893197
<a href="#">Fluffy Arcade: Coconut Shy LuckyTap 95 WEB</a>			
		<b>Front End</b>	<b>Rules</b>
		com.eyecon.orion.games.luckytap-fluffy-arcade-coconut-shy	carbine-luckyTap_fluffyArcadeCoconutShy_95_standard-config
		<b>Version</b> 1.0.7	<b>Version:</b> 1.0.0
		<b>SHA1:</b> f591c6338b95446e2bbd5e32d7bfaca75cdd525f	<b>SHA1:</b> a3184bdce8fe68a1281bcb30cb53fdd02a373973
<a href="#">Fluffy Arcade: Coconut Shy LuckyTap 90 WEB JP</a>			
		<b>Front End</b>	<b>Rules</b>
		com.eyecon.orion.games.luckytap-fluffy-arcade-coconut-shy	carbine-luckyTap_fluffyArcadeCoconutShy_90_jackpot
		<b>Version:</b> 1.0.7	<b>Version:</b> 1.0.0
		<b>SHA1:</b> f591c6338b95446e2bbd5e32d7bfaca75cdd525f	<b>SHA1:</b> e0bd228b582f4f29b0d9d8ca8cf5866bacd89fbf
<a href="#">Fluffy Arcade: Coconut Shy LuckyTap 93 WEB</a>			
		<b>File Name</b>	
		carbine-game-engine-5.18.0-sources.jar	
		CarbineGame.java	
		EvaluationChain.java	
		RngSequences.java	
		LuckyTap.java	
		LuckyTapAudit.java	
		PaytableValue.java	
		CarbineGameComponent.java	
		LuckyTapState.java	
		WeightedLuckyTapRules.java	
		KnocksConfiguration.java	
		WeightedLuckyTapRulesImpl.java	
		ProbabilityWinMultiplier.java	
		LuckyTapGamePrize.java	
		ProbabilityPrizeCount.java	



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		<div>WeightedLuckyTap.java</div> <div>carbine-luckyTap_fluffyArcadeCoconutShy_93_standard-1.0.0-config.jar</div> <div>carbine-luckyTap_fluffyArcadeCoconutShy_93_standard-1.0.0.json</div>																																							
		<div>Fluffy Arcade: Coconut Shy LuckyTap 95 WEB</div> <table><tr><th>File Name</th></tr><tr><td>carbine-game-engine-5.18.0-sources.jar</td></tr><tr><td>CarbineGame.java</td></tr><tr><td>EvaluationChain.java</td></tr><tr><td>RngSequences.java</td></tr><tr><td>LuckyTap.java</td></tr><tr><td>LuckyTapAudit.java</td></tr><tr><td>PaytableValue.java</td></tr><tr><td>CarbineGameComponent.java</td></tr><tr><td>LuckyTapState.java</td></tr><tr><td>WeightedLuckyTapRules.java</td></tr><tr><td>KnocksConfiguration.java</td></tr><tr><td>WeightedLuckyTapRulesImpl.java</td></tr><tr><td>ProbabilityWinMultiplier.java</td></tr><tr><td>LuckyTapGamePrize.java</td></tr><tr><td>ProbabilityPrizeCount.java</td></tr><tr><td>WeightedLuckyTap.java</td></tr><tr><td>carbine-luckyTap_fluffyArcadeCoconutShy_95_standard-1.0.0-config.jar</td></tr><tr><td>carbine-luckyTap_fluffyArcadeCoconutShy_95_standard-1.0.0.json</td></tr></table> <div>Fluffy Arcade: Coconut Shy LuckyTap 90 WEB JP</div> <table><tr><th>File Name</th></tr><tr><td>carbine-game-engine-5.18.0-sources.jar</td></tr><tr><td>CarbineGame.java</td></tr><tr><td>EvaluationChain.java</td></tr><tr><td>RngSequences.java</td></tr><tr><td>LuckyTap.java</td></tr><tr><td>LuckyTapAudit.java</td></tr><tr><td>PaytableValue.java</td></tr><tr><td>CarbineGameComponent.java</td></tr><tr><td>LuckyTapState.java</td></tr><tr><td>WeightedLuckyTapRules.java</td></tr><tr><td>KnocksConfiguration.java</td></tr><tr><td>WeightedLuckyTapRulesImpl.java</td></tr><tr><td>ProbabilityWinMultiplier.java</td></tr><tr><td>LuckyTapGamePrize.java</td></tr><tr><td>ProbabilityPrizeCount.java</td></tr><tr><td>WeightedLuckyTap.java</td></tr><tr><td>carbine-luckyTap_fluffyArcadeCoconutShy_90_jackpot-1.0.0-config.jar</td></tr><tr><td>carbine-luckyTap_fluffyArcadeCoconutShy_90_jackpot-</td></tr></table>	File Name	carbine-game-engine-5.18.0-sources.jar	CarbineGame.java	EvaluationChain.java	RngSequences.java	LuckyTap.java	LuckyTapAudit.java	PaytableValue.java	CarbineGameComponent.java	LuckyTapState.java	WeightedLuckyTapRules.java	KnocksConfiguration.java	WeightedLuckyTapRulesImpl.java	ProbabilityWinMultiplier.java	LuckyTapGamePrize.java	ProbabilityPrizeCount.java	WeightedLuckyTap.java	carbine-luckyTap_fluffyArcadeCoconutShy_95_standard-1.0.0-config.jar	carbine-luckyTap_fluffyArcadeCoconutShy_95_standard-1.0.0.json	File Name	carbine-game-engine-5.18.0-sources.jar	CarbineGame.java	EvaluationChain.java	RngSequences.java	LuckyTap.java	LuckyTapAudit.java	PaytableValue.java	CarbineGameComponent.java	LuckyTapState.java	WeightedLuckyTapRules.java	KnocksConfiguration.java	WeightedLuckyTapRulesImpl.java	ProbabilityWinMultiplier.java	LuckyTapGamePrize.java	ProbabilityPrizeCount.java	WeightedLuckyTap.java	carbine-luckyTap_fluffyArcadeCoconutShy_90_jackpot-1.0.0-config.jar	carbine-luckyTap_fluffyArcadeCoconutShy_90_jackpot-	
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		1.0.0.json
		pool-server-service-1.7.0.jar
		ProbabilityPoolImpl.java
		MysteryPoolImpl.java
3.	Features that characterise the software object	See at the end of this table <sup>1</sup>
4.	Any % RTP	See at the end of this table <sup>2</sup>
5.	List of software executables and digital signatures (SHA-1)	See at the end of this table <sup>3</sup>
6.	Other records	None

**<sup>1</sup> Features that characterise the software object**

No.	Game Name	Game Type	Game Description	Min Bet*	Max Bet*
1.	Fluffy Arcade: Coconut Shy LuckyTap	Slot	<b>Fluffy Arcade: Coconut Shy LuckyTap</b> is a slot game that randomly award prizes from 3 to 18 with random multipliers. Also, the game has a Free Games feature with retriggers.	£ 0.10	£ 150.00

\*Tested on the test environment; may vary on production environment depending on the operator's configurations.

**<sup>2</sup> RTP for the game**

No.	Game Name	Theoretical RTP*	Simulated RTP*
1.	Fluffy Arcade: Coconut Shy LuckyTap 93 WEB	93.428%	93.432%
2.	Fluffy Arcade: Coconut Shy LuckyTap 95 WEB	95.439%	95.453%
3.	Fluffy Arcade: Coconut Shy LuckyTap 90 WEB JP	90.524% + Jackpot 3.0%	90.480%

\*Verified the RTP only up to 2 decimals accuracy.

**<sup>3</sup> List of software executables and digital signatures (SHA-1)**

Fluffy Arcade: Coconut Shy LuckyTap 93 WEB

File Name	SHA-1
carbine-game-engine-5.18.0.jar	44713b8720cc1413e09ff12dad648dd4498b9747
CarbineGame.class	875199c6c3c99a5b0a7c4ba2b938e11c04784a7
EvaluationChain.class	e9c22e7207efd683db6817f7fe83fd77ca054e89
RngSequences.class	b5e85b10ab646b596e6be2f98ea8230c6f966ed4
LuckyTap.class	c92a6379fd34312cdb0644b39c5ed4b32c99e3ec
LuckyTapAudit.class	11a0cdd75798bf7caeb9c11924af1280e8225ac3
PaytableValue.class	54705af693718d3d4ae384b8aeaabf87d0f109db
CarbineGameComponent.class	c7585f7b8c7e1101dff6010db2d68ee9dd9f023c
LuckyTapState.class	4a3ac448715b809c41768907e2698680e2a7fa6a
WeightedLuckyTapRules.class	aeb8c794ff8c918a9a6f6f28e66d143880f48095

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KnocksConfiguration.class	0001115f5427288169acd8c8e9313307f5ec5ee9
WeightedLuckyTapRulesImpl.class	d8e26128fb19079713a2d99ec20861132b727886
ProbabilityWinMultiplier.class	8abc222fa31c020eba46bd70e20a2989087e64d4
LuckyTapGamePrize.class	7157a8d62ebd8345848a3632ea3172efc6efe435
ProbabilityPrizeCount.class	024a87c123da2dc692a3a428cfe9aa7be298517a
WeightedLuckyTap.class	6c4fb092ebb169e48d23e0dad8d3fa31dea1ea61
carbine-luckyTap_fluffyArcadeCoconutShy_93_standard-1.0.0-config.jar	3bedea2b48626e0f362018e44bb0df23ec893197
carbine-luckyTap_fluffyArcadeCoconutShy_93_standard-1.0.0.json	9292e425f53f9372bfc1ec26e53e7179b69e0dca

**Fluffy Arcade: Coconut Shy LuckyTap 95 WEB**

File Name	SHA-1
carbine-game-engine-5.18.0.jar	44713b8720cc1413e09ff12dad648dd4498b9747
CarbineGame.class	875199c6c3c99a5b0a7c4cba2b938e11c04784a7
EvaluationChain.class	e9c22e7207efd683db6817f7fe83fd77ca054e89
RngSequences.class	b5e85b10ab646b596e6be2f98ea8230c6f966ed4
LuckyTap.class	c92a6379fd34312cdb0644b39c5ed4b32c99e3ec
LuckyTapAudit.class	11a0cdd75798bf7caeb9c11924af1280e8225ac3
PaytableValue.class	54705af693718d3d4ae384b8aeaabf87d0f109db
CarbineGameComponent.class	c7585f7b8c7e1101dff6010db2d68ee9dd9f023c
LuckyTapState.class	4a3ac448715b809c41768907e2698680e2a7fa6a
WeightedLuckyTapRules.class	aeb8c794ff8c918a9a6f6f28e66d143880f48095
KnocksConfiguration.class	0001115f5427288169acd8c8e9313307f5ec5ee9
WeightedLuckyTapRulesImpl.class	d8e26128fb19079713a2d99ec20861132b727886
ProbabilityWinMultiplier.class	8abc222fa31c020eba46bd70e20a2989087e64d4
LuckyTapGamePrize.class	7157a8d62ebd8345848a3632ea3172efc6efe435
ProbabilityPrizeCount.class	024a87c123da2dc692a3a428cfe9aa7be298517a
WeightedLuckyTap.class	6c4fb092ebb169e48d23e0dad8d3fa31dea1ea61
carbine-luckyTap_fluffyArcadeCoconutShy_95_standard-1.0.0-config.jar	a3184bdce8fe68a1281bcb30cb53fdd02a373973
carbine-luckyTap_fluffyArcadeCoconutShy_95_standard-1.0.0.json	acc8b1d48f3378cdaa0ffa24ff533762a1469713

**Fluffy Arcade: Coconut Shy LuckyTap 90 WEB JP**

File Name	SHA-1
carbine-game-engine-5.18.0.jar	44713b8720cc1413e09ff12dad648dd4498b9747
CarbineGame.class	875199c6c3c99a5b0a7c4cba2b938e11c04784a7
EvaluationChain.class	e9c22e7207efd683db6817f7fe83fd77ca054e89
RngSequences.class	b5e85b10ab646b596e6be2f98ea8230c6f966ed4
LuckyTap.class	c92a6379fd34312cdb0644b39c5ed4b32c99e3ec
LuckyTapAudit.class	11a0cdd75798bf7caeb9c11924af1280e8225ac3
PaytableValue.class	54705af693718d3d4ae384b8aeaabf87d0f109db
CarbineGameComponent.class	c7585f7b8c7e1101dff6010db2d68ee9dd9f023c
LuckyTapState.class	4a3ac448715b809c41768907e2698680e2a7fa6a
WeightedLuckyTapRules.class	aeb8c794ff8c918a9a6f6f28e66d143880f48095
KnocksConfiguration.class	0001115f5427288169acd8c8e9313307f5ec5ee9
WeightedLuckyTapRulesImpl.class	d8e26128fb19079713a2d99ec20861132b727886
ProbabilityWinMultiplier.class	8abc222fa31c020eba46bd70e20a2989087e64d4
LuckyTapGamePrize.class	7157a8d62ebd8345848a3632ea3172efc6efe435
ProbabilityPrizeCount.class	024a87c123da2dc692a3a428cfe9aa7be298517a
WeightedLuckyTap.class	6c4fb092ebb169e48d23e0dad8d3fa31dea1ea61
carbine-luckyTap_fluffyArcadeCoconutShy_90_jackpot-	e0bd228b582f4f29b0d9d8ca8cf5866bacd89fbf





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1.0.0-config.jar	
carbine-luckyTap_fluffyArcadeCoconutShy_90_jackpot-1.0.0.json	20d1948b5ae4e243af4ce8d04b0594cb3ac19958
pool-server-service-1.7.0.jar	473eeb4de802bdaf606e069671571f7aec2f8787
ProbabilityPoolImpl.class	704c70a769c6984f58a2c9af1cdb790c9029313e
MysteryPoolImpl.class	b23e9682bb112e26ffb96668ae57e03751989402

### IV. Details of tests

Product identification: Fluffy Arcade: Coconut Shy LuckyTap

Technical standards used for evaluation: Please refer to Appendix at the end of this report.

No.	Tests Performed	Details of Tests	Results
<b>Desktop</b>			
1.	Game rules & artwork evaluation	Evaluation of game rules and artwork was conducted to ensure that they satisfy relevant requirements in the standards and the game does work according to the game rules and artwork.	Passed
2.	Functional tests	Functional tests were conducted to verify that the game satisfies the relevant requirements in the standards.	Passed
3.	Emulation tests	Emulation tests were conducted to verify that the game payouts are in accordance with the payable and maths.	Passed
4.	Theoretical RTP	Theoretical RTP verification was conducted for the game. See section III.4 above.	Passed
5.	Simulated RTP	RTP simulations using the game code were conducted for the game. See section III.4 above.	Passed
6.	Source code review	Source code examination was performed on critical components of the software to ensure that the game complies with the relevant standards and that there are no unintended functionalities.	Passed
7.	Game performance report	Controlled tests were conducted to ensure that the Game Performance Report reflects the actual game play and the data obtained is complete and accurate.	Passed
<b>Mobile</b>			
1.	Game rules & artwork evaluation (as required for mobile-specific components)	Evaluation of game rules and artwork was conducted for mobile-specific components to ensure that they satisfy relevant requirements in the standards and the game does work according to the game rules and artwork.	Passed
2.	Functional tests (as required for mobile-specific components)	Functional tests were conducted for mobile-specific components to ensure that they satisfy relevant requirements in the standards.	Passed
3.	Regression tests	Regression tests were conducted to verify gameplay, accuracy of balance update, game history, and to verify that the mobile version of the game is the same as the desktop version.	Passed
4.	Paytable verification	Paytable verification was conducted to verify that the game payouts are in accordance with the payable.	Passed
5.	Source code review	Source code examination was performed to verify	Passed



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		that the desktop and mobile versions of the game share the same source code.	
<b>Other</b>			
1.	Other records	<p>Fluffy Arcade: Coconut Shy LuckyTap is a new game and has not been previously certified.</p> <p>Testing was conducted on the following devices:</p> <ul style="list-style-type: none"><li>• PC</li><li>• iPhone Xs Max (Browser: Safari)</li><li>• Samsung Galaxy S20 (Browser: Chrome)</li><li>• iPad Mini 4 (Browser: Safari)</li><li>• Samsung Galaxy Tab 4 (Browser: Chrome)</li></ul>	Not applicable

Note: Evaluation was conducted at iTech Labs facilities in Australia and India. All functional tests were conducted remotely (i.e. remote test environment hosted on customer's site).

## V. Final declaration and conformity

No.	Description	Details
1.	Certification	<p>Date of certification: 11 June 2025</p> <p>Software provider: Eyecon Alderney Limited</p> <p>Licensee name: N/A</p> <p>Licensee site URLs: N/A</p> <p>iTech Labs certifies that Fluffy Arcade: Coconut Shy LuckyTap comply with the relevant requirements (as applicable for software providers) listed in <b>Appendix</b> below.</p> <p>iTech Labs recommends that Fluffy Arcade: Coconut Shy LuckyTap be approved for deployment.</p>

## Signatures:

Authorised by:  <hr/> <b>Eric Sheng</b> <b>Project Manager</b> <b>iTech Labs</b> 11 June 2025	Signed by:  <hr/> <b>Alvin Rizaldi</b> <b>Chief Executive Officer</b> <b>iTech Labs</b> 11 June 2025
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## VI. Conclusion

While it is not possible to test all possible scenarios in a laboratory environment, iTech Labs has conducted a level of testing appropriate for a submission of this type.

Accordingly, subject to the above comments, iTech Labs certifies that the items under test comply with the relevant Technical Standards, unless otherwise stated.



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# Appendix



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### UK Gambling Commission

UK Remote Gambling and Software Technical Standards  
February 2021

Testing Strategy for Compliance with Remote Gambling and Software Technical Standards  
February 2021

#### I. Complete requirements met by the tests

Requirements	Results
<b>RTS 1 – Customer account Information</b>	
RTS requirement 1A	Comply
RTS requirement 1B	Operator responsibility*
RTS requirement 1C	Operator responsibility*
<b>RTS 2 – Displaying transactions</b>	
RTS requirement 2A	Comply, except for currency conversion and price fluctuations (if applicable) which are the operator's responsibility*.
RTS requirement 2B	Comply, the game rules have been verified to ensure the game works according to the rules. Presentation (appearance) of the game rules to players (including links to access the game rules) is the operator's responsibility*.
RTS requirement 2C	Operator responsibility*
RTS requirement 2D	Operator responsibility*
RTS requirement 2E	Comply
<b>RTS 3 – Rules, game descriptions and the likelihood of winning</b>	
RTS requirement 3A	Comply, the game rules have been verified to ensure the game works according to the rules. Presentation (appearance) of the game rules to players (including links to access the game rules) is the operator's responsibility*.
RTS requirement 3B	Comply, the game rules have been verified to ensure the game works according to the rules. Presentation (appearance) of the game rules to players (including links to access the game rules) is the operator's responsibility*.
RTS requirement 3C	Comply except for RTS 3C ii and RTS 3C iv which are not applicable, the game rules have been verified to ensure the game works according to the rules. Presentation (appearance) of the game rules to players (including links to access the game rules) is the operator's responsibility*.
RTS requirement 3D	Comply, the game rules have been verified to ensure the game works according to the rules. Presentation (appearance) of the game rules to players (including links to access the game rules) is the operator's responsibility*.
<b>RTS 4 – Time critical events</b>	
RTS requirement 4A	Not applicable, no time critical events.
RTS requirement 4B	Not applicable, no time critical events.

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<b>RTS 5 – Result Determination</b>	
RTS requirement 5A	Comply, the game rules have been verified to ensure the game works according to the rules. Presentation (appearance) of the game rules to players (including links to access the game rules) is the operator's responsibility*.
<b>RTS 6 – Result determination for play-for-free games</b>	
RTS requirement 6A	Comply
<b>RTS 7 – Generation of random outcomes</b>	
RTS requirement 7A	Covered by a separate RNG certification
RTS requirement 7B	Comply, the game rules have been verified to ensure the game works according to the rules. Presentation (appearance) of the game rules to players (including links to access the game rules) is the operator's responsibility*.
RTS requirement 7C	Comply
RTS requirement 7D	Comply
RTS requirement 7E	Comply
<b>RTS 8 – Auto-play functionality</b>	
RTS requirement 8A	Not applicable
RTS requirement 8B	Not applicable
RTS requirement 8C	Comply
<b>RTS 9 – Progressive jackpot systems</b>	
RTS requirement 9A	Comply
RTS requirement 9B	Comply
<b>RTS 10 – Interrupted gambling</b>	
RTS 10 - 10A	Operator responsibility*
RTS 10 – 10B	Comply
RTS 10 – 10C	Operator responsibility*
<b>RTS 11 – Limiting collusion/cheating</b>	
RTS 11 - 11A	Not applicable, the module tested is not P2P.
RTS 11 – 11B	Not applicable, the module tested is not P2P.
<b>RTS 12 – Financial limits</b>	
RTS 12 - 12A	Operator responsibility*
RTS 12 – 12B	Operator responsibility*
<b>RTS 13 – Time requirements and reality checks</b>	
RTS 13 - 13A	Comply
RTS 13 – 13B	Comply
RTS 13 – 13C	Comply
<b>RTS 14 – Responsible product design</b>	

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RTS 14 - 14A	Comply
RTS 14 – 14B	Not applicable, the module tested is not platform.
RTS 14 – 14C	Operator responsibility*
RTS 14 – 14D	Comply
RTS 14 – 14E	Comply
RTS 14 – 14F	Comply
RTS 15– In-play betting	
RTS 15- 15A	Not applicable, the module tested is not 'betting'.
RTS 16– Use of third party software	
RTS 16-16A	Not applicable, the module tested is not P2P.
RTS 16-16B	Not applicable, the module tested is not P2P.
RTS 16-16C	Not applicable, the module tested is not P2P.
RTS 17– Live dealer studios	
RTS 17-17A	Not applicable, the module tested is not 'live'.

\*Eyecon is a software provider. It is the operator's responsibility to ensure that these requirements are satisfied.

## II. Observations

None.

## III. Conditions

This round of certification is for game only. RNG and Platform requirements are out of scope.  
 Eyecon is a software provider.  
 Before the game is released to production, all operator-responsibility items listed under **I. Complete requirements met by the tests** must be satisfied by the operator.

## IV. Level of Certification

Fluffy Arcade: Coconut Shy LuckyTap has passed all tests according to testing requirements (as required for software providers) of the two categories in UK Remote Gambling and Software Technical Standards - February 2021, subject to integration of the certified game into the live environment (or development/staging environment which is essentially the same as the live environment) and satisfactory verification of any operator-specific functions not covered by this certification as indicated in Section I. Complete requirements met by the tests.

Note - the two categories of testing requirements are:

"testing requirements that require external testing" – these must be assessed by a third party (approved test lab).

"testing requirements that do not require external testing" – these are capable of being tested and verified by the operator (or software provider).

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### Gibraltar

Remote Technical and Operating Standards for the Gibraltar Gambling Industry  
Gambling Commissioner's Guidelines - v.1.1.0

#### I. Complete requirements met by the tests

Requirements	Results
Standard 2 - Registration of participants and administration	
2.4.3 Game history	Operator responsibility
2.4.4 Game history (betting)	Not applicable
Standard 3 – Presentation of rules and customer information	
3.4 Game rules and information	Comply, subject to section <b>II. Observations</b> below
3.5 Jackpots	Comply
3.6 Multi-customer games	Not applicable
3.7 Monitoring of rules	Operator responsibility
Standard 7 – Fair gambling	
7.1 Game fairness	Comply, subject to section <b>II. Observations</b> below
7.2. 'Play for Free' games	Operator responsibility
7.3. Compensated or adaptive games	Comply
7.4. No forced game play	Comply
7.5. Auto-play	Not applicable
7.6. Game control	Operator responsibility
7.7. Incomplete games	Comply, subject to section <b>II. Observations</b> below
7.8. Game / website design	Comply
7.9. Poker / P2P games	Not applicable
7.10. Sports betting and integrity	Not applicable
Standard 9 – Business continuity	
9.1 General	Comply, subject to section <b>II. Observations</b> below
Standard 11 – Randomness	
11.1 RNG and game randomness	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
11.2 Mechanical RNGs	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
11.3 RNG failure	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
11.4 Verifiably fair	Not applicable (this report is a game certification report, RNG certification is not covered by this report)

#### II. Observations

No.	Description	Remarks	Notes
1.	<b>RTOS 2.4.3 Game History</b>	Eyecon is a licensed game and software provider.	Operator responsibility

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		iTech Labs has verified the presence of all game history elements and the accuracy aspect of the history (i.e. completed games are accurately recorded in the game history). Presentation (appearance) of game history to players is the licensee's responsibility.	
2.	<b>RTOS 3.4.5</b> The availability of game rules and information should be checked regularly; if the information is not available the game should not be made available for gambling.	Eyecon is a licensed game and software provider. It is the licensee's obligation to make sure this requirement is satisfied.	Operator responsibility
3.	<b>RTOS 3.4.11</b> The general playing rules and the payout percentage for a particular game should be the same in free play mode as it is in the real money game.	Eyecon is a licensed game and software provider. 'play for fun' offer is the licensee's responsibility. It is the licensee's obligation to make sure this requirement is satisfied.	Operator responsibility
4.	<b>RTOS 3.7.3</b> Applicable game rules and/or information should not be changed during a session unless adequate advance notification is given to customer. (e.g. where customers have incomplete games, etc).  <b>RTOS 3.7.4</b> Applicable game rules and/or information should not be changed between a customer making a bet and the result of the bet being generated and calculated unless the customer was aware of the change before the bet was made. For jackpots, parameters should not be altered outside stated T&C's once customer(s) have contributed to the jackpot.  <b>RTOS 3.7.5</b> Changes to rules and pay tables should not be retrospective in their effect. Generally, and wherever possible, changes should be applied when the facility is inactive or deactivated and be readily apparent to any customer returning to a facility.	Eyecon is a licensed game and software provider. It is the licensee's obligation to make sure these requirements are satisfied.	Operator responsibility
5.	<b>RTOS 7.1.1</b> Licence holders should make information available to customers on their website(s) about their testing and quality assurance arrangements in place to assure fairness and randomness in their gaming products, including information about testing/certification by an ATF where applicable and where this can be	Eyecon is a licensed game and software provider. It is the licensee's obligation to make sure these requirements are satisfied.	Operator responsibility



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	<p>accessed.</p> <p><b>RTOS 7.1.2</b></p> <p>Licence holders should ensure appropriate systems and resources are deployed to prevent or detect attempts to cheat by customers or other parties. Such measures should be applied on a risk sensitive basis, with analytic programs (e.g. algorithms, exception reports, cluster analysis) deployed to identify long term or systemic cheating as well as short/medium term sporadic efforts.</p>		
6.	<p><b>RTOS 7.2</b></p> <p><b>'Play for Free' Games</b></p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Operator responsibility
7.	<p><b>RTOS 7.6.1</b></p> <p>It should be possible for the licence holder to disable any game or game session.</p> <p><b>RTOS 7.6.2</b></p> <p>The licence holder should be able to provide full audit trails when disabling a game that is currently in play.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure these requirements are satisfied.</p>	Operator responsibility
8.	<p><b>RTOS 7.7.1</b></p> <p>Where possible, licence holders should provide a mechanism in single player games for an incomplete game to be completed before a customer is able to participate in any other game. Incomplete games may occur as a result of:</p> <p>c) Game disabled by licence holder.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>Game disable functions are the licensee's responsibility.</p> <p>It is the licensee's obligation to make sure this requirement is satisfied.</p>	Operator responsibility
9.	<p><b>RTOS 9.1.5</b></p> <p>Recorded transaction information involving customer funds should be recoverable by the system in the event of a failure or malfunction.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Operator responsibility

### III. Conditions

Before the game is released to production, all licensee-responsibility items listed under **II. Observations** must be satisfied by the licensee.

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IOM Online Gambling (Systems Verification) (No. 2)  
Regulations 2007

**I. Complete requirements met by the tests**

Requirements	Results
<b>Schedule 1 – General</b>	
OGSV Schedule 1 – 1	
OGSV Schedule 1 – 1a	Comply
OGSV Schedule 1 – 1b	Comply
OGSV Schedule 1 – 1c	Comply
OGSV Schedule 1 – 1d	Not applicable
OGSV Schedule 1 – 2	Operator responsibility
<b>Schedule 1 – Randomness</b>	
OGSV Schedule 1 – 3	
OGSV Schedule 1 – 3a	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
OGSV Schedule 1 – 3b	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
OGSV Schedule 1 – 3c	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
OGSV Schedule 1 – 4	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
OGSV Schedule 1 – 5	Comply
OGSV Schedule 1 – 6	Comply
OGSV Schedule 1 – 7	
OGSV Schedule 1 – 7a	Comply
OGSV Schedule 1 – 7b	Comply
OGSV Schedule 1 – 7c	Comply
OGSV Schedule 1 – 7d	Comply
OGSV Schedule 1 – 7e	Comply
OGSV Schedule 1 – 7f	Comply
OGSV Schedule 1 – 7g	Comply
<b>Schedule 1 – Reporting Requirements</b>	
OGSV Schedule 1 – 8	Operator responsibility
OGSV Schedule 1 – 9	
OGSV Schedule 1 – 9a	Operator responsibility
OGSV Schedule 1 – 9b	Operator responsibility
OGSV Schedule 1 – 10	



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OGSV Schedule 1 – 10a	Comply
OGSV Schedule 1 – 10b	Comply
OGSV Schedule 1 – 10c	Comply
OGSV Schedule 1 – 10d	Comply
OGSV Schedule 1 – 10e	Comply
OGSV Schedule 1 – 10f	Comply
OGSV Schedule 1 – 10g	Comply
OGSV Schedule 1 – 10h	Comply
OGSV Schedule 1 – 10i	Comply
OGSV Schedule 1 – 10j	Comply
OGSV Schedule 1 – 11	
OGSV Schedule 1 – 11a	Operator responsibility
OGSV Schedule 1 – 11b	Operator responsibility
OGSV Schedule 1 – 11c	Operator responsibility
OGSV Schedule 1 – 11d	Operator responsibility
<b>Schedule 2 – Betting</b>	
OGSV Schedule 2 – 1	Not applicable
OGSV Schedule 2 – 2	
OGSV Schedule 2 – 2a	Not applicable
OGSV Schedule 2 – 2b	Not applicable
OGSV Schedule 2 – 2c	Not applicable
OGSV Schedule 2 – 2d	Not applicable
OGSV Schedule 2 – 3	Not applicable
OGSV Schedule 2 – 4	
OGSV Schedule 2 – 4a	Not applicable
OGSV Schedule 2 – 4b	Not applicable
OGSV Schedule 2 – 5	
OGSV Schedule 2 – 5a	Not applicable
OGSV Schedule 2 – 5b	Not applicable
OGSV Schedule 2 – 5c	Not applicable
OGSV Schedule 2 – 5d	Not applicable
OGSV Schedule 2 – 5e	Not applicable
OGSV Schedule 2 – 5f	Not applicable
OGSV Schedule 2 – 5g	Not applicable
OGSV Schedule 2 – 5h	Not applicable
OGSV Schedule 2 – 6	Not applicable
OGSV Schedule 2 – 7	Not applicable
OGSV Schedule 2 – 8	Not applicable
OGSV Schedule 2 – 9	Not applicable

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### II. Observations

No.	Description	Remarks	Notes
1.	<b>OGSV Schedule 1 – 2</b> Both the Online Gambling and financial transactions software must be congruent and secure.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Operator responsibility
2.	<b>OGSV Schedule 1 – 8</b> All financial reports produced by the System must be readily reconcilable with Gaming or Lottery transaction reports (as relevant) and conversely. All such reports shall be freely available to the Commissioners.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Operator responsibility
3.	<b>OGSV Schedule 1 – 9</b> The System must: a) be capable of producing auditable and aggregated financial statements of Gaming and/or Lottery transactions (as relevant). b) calculate accurately all excise of duty payable under the Act and other monies due to the Treasury under the Act.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Operator responsibility
4.	<b>OGSV Schedule 1 – 11</b> The System must maintain information about significant events as follows: a) large wins (as agreed by the Commissioners from time to time); b) transfers of funds (between Participants or between any Participant and the Operator) in excess of such amount as the Commissioners may from time to time direct by notice in writing to the Operator; c) material changes made by the Operator to Game and/or Lottery returns, disclosed under paragraph 7 above; and d) material fluctuations in theoretical/estimated statistical return to Participants (agreed with the Commissioners from time to time).	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Operator responsibility

### III. Conditions

Before the game is released to production, all licensee-responsibility items listed under **II. Observations** must be satisfied by the licensee.

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### Malta

Malta Remote Gaming Regulations S.L.438.04

LEGAL NOTICE (L.N.) 131 of 2016

Directive 2 of 2018 - Player Protection Directive - V3 – January 2023

### I. Complete requirements met by the tests

Requirements	Results
<b>Part IX</b>	
Part IX - 45	Comply
Part IX – 46A (1)	Superseded by: Directive 2 of 2018 - Player Protection Directive - V3 – January 2023 Part VII – Return to Player - Requirement 22
<b>Part X – Aborted and Miscarried Games</b>	
Part X – 47.1	Comply
Part X – 47.2	Not applicable
Part X – 48	Operator responsibility
<b>Third Schedule – Regulation 25 Technical Requirement for Gaming System</b>	
Third Schedule – 1	
Third Schedule – 1a	Comply
Third Schedule – 1b	Operator responsibility
Third Schedule – 2	Operator responsibility
Third Schedule – 3	
Third Schedule – 3a	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
Third Schedule – 3b	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
Third Schedule – 3c	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
Third Schedule – 4	Comply
Third Schedule – 5	Comply
Third Schedule – 6	
Third Schedule – 6a	Comply
Third Schedule – 6b	Comply
Third Schedule – 6c	Comply
Third Schedule – 6d	Comply
Third Schedule – 6e	Comply
Third Schedule – 6f	Comply
Third Schedule – 7	Operator responsibility
Third Schedule – 8	
Third Schedule – 8a	Operator responsibility
Third Schedule – 8b	Operator responsibility

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Third Schedule – 9	
Third Schedule – 9a	Comply
Third Schedule – 9b	Comply
Third Schedule – 9c	Comply
Third Schedule – 9d	Comply
Third Schedule – 9e	Comply
Third Schedule – 9f	Comply
Third Schedule – 9g	Comply
Third Schedule – 9h	Comply
Third Schedule – 9i	Comply
Third Schedule – 10	
Third Schedule – 10a	Operator responsibility
Third Schedule – 10b	Operator responsibility
Third Schedule – 10c	Operator responsibility
<b>Directive 2 of 2018 - Player Protection Directive</b> <b>V2 May 2021</b>	
Part III – Terms and Conditions	
Part III – 7. (1)	Comply
Part III – 7. (1) (a)	Comply
Part III – 7. (2)	Comply
Part III – 8	Not applicable
Part VII – Return to Player	
Part VII – 22. (1)	Comply

## II. Observations

No.	Description	Remarks	Notes
1.	<p><b>Part X – 48</b></p> <p>(1) If a game is started but miscarries because of a failure of the licensee's computer operating system, the licensee shall:</p> <p>(a) (i) refund the amount wagered in the game to the player by crediting it to the player's account or, if the account no longer exists, by paying it to the player in an approved manner; and</p> <p>(a) (ii) if the player has an accrued credit at the time the game miscarries, credit to the player's account the monetary value of the credit or, if the account no longer exists, pay it to the player in an approved manner;</p> <p>(b) inform immediately the Authority of the circumstances of the incident;</p> <p>(c) refrain from conducting a further game if the game is likely to be affected by the</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Operator responsibility

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	<p>same failure:</p> <p>Provided that the Authority may, by written notice to the licensee, give the licensee other directions which the Authority considers appropriate in the circumstances.</p>		
2.	<p><b>Third Schedule – 1</b></p> <p>The gaming system must:</p> <p>(b) provide over time no more than the expected house advantage to the operator.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Operator responsibility
3.	<p><b>Third Schedule – 2</b></p> <p>Both the gaming and financial transactions must be congruent and secure.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Operator responsibility
4.	<p><b>Third Schedule – 7</b></p> <p>All financial reports produced by the gaming system must be congruent with gaming transaction reports and conversely: Provided that all such reports shall be readily and freely available to the Authority.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Operator responsibility
5.	<p><b>Third Schedule – 8</b></p> <p>The gaming system must:</p> <p>(a) be capable of producing monthly auditable and aggregate financial statements of gaming transactions, and</p> <p>(b) calculate accurately all taxation and other monies due to the Authority.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Operator responsibility
6.	<p><b>Third Schedule – 10</b></p> <p>The gaming system must maintain information about significant events as follows:</p> <p>(a) large wins;</p> <p>(b) transfers of funds in excess of such amount as the Authority may from time to time direct by notice in writing to the operator;</p> <p>(c) changes made by the operator to game parameters.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Operator responsibility

### III. Conditions

Before the game is released to production, all licensee-responsibility items listed under **II. Observations** must be satisfied by the licensee.